

Milestone Schedule
Nevada Environmental Response Trust (NERT) Site
Henderson, NV
Revised – September 1, 2011

I. On-Going Excavation/Backfill Program

- a. Develop Draft Site-Wide Risk Management Plan – September, 2011
(Draft submitted on March 31, 2011; comments received from NDEP on April 19, 2011; revised draft submitted on June 10, 2011, currently developing Excavation Control Areas appendix discussed with NDEP at our May 24 meeting; interim draft of ECA Table and Map submitted to NDEP on June 24, 2011; Comments received from NDEP on July 14, 2011; currently awaiting identification of final ECAs)
- b. Determination of Final Scope of Excavation/Backfill Program – September 15, 2011
 - i. Develop Soil Sampling Program for Visually Impacted Soils – *(Submitted to NDEP on April 18, 2011; approval received from NDEP; sampling program executed in August)*
 - ii. Identify final Excavation Control Areas – September 15, 2011 *(ECAs were discussed at May 24 meeting with NDEP; final list of ECAs to be developed on final sampling results and included with Site Management Plan; interim draft of ECA Table and Map submitted to NDEP on June 24, 2011; currently awaiting sampling results from recent RZ-E post-excavation dioxin TEQ analysis)*
 - iii. Implement additional post-excavation sampling in RZ-E *(sample collected on August 31, dioxin results pending)*
- c. Complete Excavation Program – September 15, 2011 *(Dependent on sampling results pursuant to Item b)*
- d. Complete Backfill/Grading Program – Mid-End September 2011 *(Dependent on completion of Item c)*
- e. Develop Draft Excavation Completion Report – October 30, 2011
- f. Develop Final Excavation Completion Report – November 30, 2011

II. Compliance Monitoring

- a. Conduct Annual Groundwater Monitoring - Completed in May 2011
- b. Submit Annual Groundwater Compliance Monitoring Report – Submitted August 31, 2011

III. Groundwater Remedy

- a. Capture Zone Evaluation Report – May 10, 2011 Conference call scheduled (*Comments received from NDEP on April 5, 2011; Spoke with NDEP requesting a delay to after future discussions on RAOs and overall long-term strategy with respect to groundwater remedy; new RAOs currently under development and the need for CZE will be considered subsequently; ENVIRON received SOW from Northgate to finalize CZE Report; further discussions on hold pending resolution of regulatory framework and long-term schedule issues*)
- b. Response to NDEP Comments on LSSL Technical Memorandum – Submitted to NDEP on May 9, 2011
- c. Develop Remedial Action Objectives (RAOs) – August 31, 2011
 - i. Identify preliminary RAOs for consideration by NDEP – Submitted to NDEP on April 27, 2011
 - ii. Revise preliminary RAOs - June 24, 2011 (*preliminary RAOs discussed at May 24 meeting with NDEP and revisions based on NDEP's comments have been incorporated into revised draft*)
 - iii. Discussions with NDEP and Stakeholders to develop final RAOs – To be Determined
- d. Conduct GWETS and Monitoring Program Optimization Study – September 30, 2011
 - i. Develop technical memo on monitoring program efficiency – (*Received draft technical memo from Northgate on August 26, 2011, currently under review*)
 - ii. Review GWETS operations – Site Visit to be scheduled prior to September 15, 2011
 - iii. Develop Optimization Report – September 30, 2011

IV. Other

- a. Submit GW-11 Dam Permit Application – Submitted to NDWR on May 9, 2011
- b. Complete Subcontracting and Plan for AP-5 Remediation – To be included in Site-Wide Remedy
- c. Response to NDEP Comments on January 28, 2011 DVSR – Additional Preconfirmation Sampling – Submitted to NDEP on April 14, 2011
- d. Tronox Stormwater Permitting – (*Discussed with NDEP DWR on May 9, 2011; June 7 meeting held with Tronox and neighboring property owners to discuss options; NDEP inspection on June 15, 2011; segregation of Timet storm water completed week of July 18; requested from Tronox As-Built plans to confirm segregation*)
- e. Sampling of Asbestos Abatement Washwater – Draft Sampling Plan submitted to NDEP September 1, 2011